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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

9 IRMA RAMIREZ and DAREN }  
10 HEATHERLY, }  
11 Plaintiffs, }

CASE NO CV-11-3089-JCS

12 v. }  
13 CASA SANCHEZ RESTAURANT; }  
14 MARTHA SANCHEZ; ROBERT C. }  
15 SANCHEZ; and FANTE, INC., a }  
16 California Corporation dba CASA }  
17 SANCHEZ FOODS, }

**STIPULATION OF DISMISSAL OF  
ACTION WITH PREJUDICE**

18 Defendants.

19 The parties, by and through their respective counsel, stipulate to the dismissal of this  
20 action in its entirety with prejudice pursuant to Fed.R.Civ.P.41(a)(1). Outside of the terms of the  
21 Settlement Agreement and General Release ("Agreement") herein, each party is to bear its own  
22 costs and attorneys' fees. The parties further consent to and request that the Court retain  
23 jurisdiction over enforcement of the Agreement. *See Kokonen v. Guardian Life Ins. Co.*, 511  
24 U.S. 375 (1994) (empowering the district courts to retain jurisdiction over enforcement of  
25 settlement agreements).

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1 Therefore, IT IS HEREBY STIPULATED by and between the parties to this action  
2 through their designated counsel that the above-captioned action become and hereby is dismissed  
3 with prejudice pursuant to Federal Rules of Civil Procedure 41(a)(1).

4 This stipulation may be executed in counterparts, all of which together shall constitute  
5 one original document.

6  
7 Dated: April 22, 2013

THOMAS E. FRANKOVICH  
*A PROFESSIONAL LAW CORPORATION*

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10 By: /s/ Thomas E. Frankovich  
11 Thomas E. Frankovich  
12 Attorney for IRMA RAMIREZ and DAREN  
13 HEATHERLY

14 Dated: April 24, 2013

Fine, Boggs & Perkins LLP  
*Attorneys at Law*

15 By:   
16 David A. Hoslyk  
17 Attorney for Defendants MARTHA SANCHEZ;  
18 ROBERT C. SANCHEZ; and FANTE, INC., a  
19 California Corporation dba CASA SANCHEZ  
FOODS

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21 Dated: 4/29/13

